DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

DISTRICT ADDRESS AND PHONE NUMBER	DATE(S) OF INSPECTION
One Montvale Avenue Stoneham, MA 02180 (781) 587-7500 Fax:(781) 587-7556 Industry Information: www.fda.gov/oc/industry	10/10/2012 - 11/09/2012* FEI NUMBER 3005881167

NAME AND TITLE OF INDIVIDUAL TO WHOM REPORT ISSUED

TO: Gregory A. Conigliaro, Vice President and General Manager

FIRM NAME	STREET ADDRESS
Ameridose, LLC	201 and 205 Flanders Rd
CITY, STATE, ZIP CODE, COUNTRY	TYPE ESTABLISHMENT INSPECTED
Westborough, MA 01581-1032	Sterile Drug Manufacturer

OBSERVATION 10

Equipment and utensils are not cleaned, maintained, and sanitized at appropriate intervals to prevent contamination that would alter the safety, identity, strength, quality or purity of the drug product.

Specifically,

During the inspection we observed the following conditions:

A. The following (b) (4) hoods, utilized in the preparation of sterile drug products, were observed to contain what appeared to be brownish structures, atypical in shape, upon the metal surfaces between the lighting apparati and the HEPA filters, within the hoods at approximately face-level to the operator: hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood Neg. (b) (4) and hood (b) (4).

B. (b) (4), utilized in the preparation of components for sterile drug production, was observed to contain what appeared to be whitish, opaque structures upon the metal diffuser, below the HEPA filter, within the hood at approximately face-level to the operator.

C. The following (b) (4) hoods, utilized in the preparation of sterile drug products, were observed to contain what appeared to be thick residues that were orange, brown, and green in coloration within the front intakes of the hoods: hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4), hood (b) (4) and hood (b) (4). Moreover, metal surfaces comprising the front intakes were observed to be held to the hoods with plastic straps.

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D. (b) (4) Hoods (b) and (b) utilized in the preparation of sterile drug products, were observed to contain what appeared to be brownish discoloration within the HEPA filters of the hoods.

E. (b) (4) class 100 (b) (4) hoods in Building (b) (4) used to manufacture sterile products were observed to contain the following:

Hood*	Observation
(b) (4)	Exterior: visible rust on exterior.
	Interior: damaged light cover; foreign material (red substance on HEPA filter).
	Interior: broken glass; foreign material (red and white substance on HEPA filter).
	Interior: broken glass; foreign material (white substance on HEPA filter).
	Interior: exposed, uncovered strip lights
	Interior: damaged light cover; foreign material (red substance on HEPA filter and white substance on interior wall).
	Interior: foreign material (red substance on HEPA filter).

*All hoods were indicated to be clean and available for sterile processing.

OBSERVATION 11

Buildings used in the manufacture, processing, packing, or holding of a drug product do not have the suitable to facilitate cleaning, maintenance, and proper operations.

Specifically,

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A. Doors accessing Isolation Room (b) of Building (b) (4) (Class 1,000), where sterile drug product is prepared, were observed to be opened simultaneously with doors accessing the Vestibule (Class 10,000).

B. Gaps were observed beneath doors located between Room (b) (4) of Building (b) (4) (Class 1,000), where sterile drug products are prepared, and the Gowning Room (Class 10,000).

C. (b) (4) loading bay doors which separate the outdoors from the unclassified area in Building (b) (4) were observed contains gaps of approximately 1 inch. Sterile finished product is packaged and stored in the unclassified area.

D. Several gaps of approximately 0.25-0.5 inches were noted in the "pass-through boxes" and under doors which connect the unclassified area and classified area in Building (b) (4) Sterile finished product is manufactured, packed and stored in these areas.

E. The aseptic processing clean room design was inadequate. Specifically;

1. Several aseptic processing rooms at the facility lack adequate space and segregation to prevent contamination and mix-ups. Numerous lots of different products are produced simultaneously in a single room. Aseptic processing and labeling operations occur in very close proximity in an open room (e.g., Aseptic Processing Rooms (b) (4) and (b) (4)). For example, up to (b) (4) personnel generally operate in Aseptic Processing Room (b) (4) the same time. This operation requires products to be produced in separate hoods at the same time, which generally requires (b) (4) personnel per operation.

2. The facility is not adequately designed and controlled to prevent influx of contamination from lesser controlled areas. Staff enters through the Ante room (which connects to the gowning room) to initially access the clean room area from an uncontrolled, unclassified

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hallway. This hallway has many activities and offices, and multiple insects were observed in this area. Furthermore, there are no interlocking door or other design controls were in place to assure there was control over the entry to the facility from the controlled, unclassified hallway.

OBSERVATION 12

Buildings used in the manufacture, processing, packing or holding of drug products are not free of infestation by rodents, birds insects, and other vermin.

Specifically,

A. Insects were observed to be located in the unclassified area (Building (b)(4)) where finished sterile product is packaged and stored. The insects were also located within approximately 3-10 ft of the controlled area where sterile products are manufactured.

B. At least one (1) bird was observed flying in the unclassified area (Building (b)(4)) where sterile finished product is packaged and stored.

OBSERVATION 13

Equipment for adequate control over air pressure is not provided when appropriate for the manufacture, processing, packing or holding of a drug product.

Specifically,

Differential pressure is not adequately balanced and controlled between clean rooms. Specifically:

A. The firm does not monitor the pressure differential between all adjacent clean rooms, and any adjacent uncontrolled areas

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B. The firm does not evaluate any alarms resulted from their air handling system. Specifically, multiple events where air went from a higher classification toward a lower classification.

C. Not all alarms are configured to detect pressure reversal events.

D. The firm did not investigate the potential product impact of these events. Furthermore the firm has not evaluated the potential for ingress of microbial contaminants to the manufacturing areas.

E. The firm does not keep more than (b)(4) days of pressure data. The Quality Unit does not routinely assess these alarms.

F. There are no formal limits for delta P between adjacent rooms, or between rooms and the adjacent uncontrolled corridors.

G. There are no visible or audible alarms when differential pressure problems occur.

OBSERVATION 14

Procedures describing the handling of written and oral complaints related to drug products are deficiently written or followed.

Specifically,

Your firm maintains a separate file of "non-complaints" which were not processed according to your approved procedure. Additionally, your firm has not adequately defined "non-complaint" in your current approved procedure.

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OBSERVATION 15

Written complaint records do not include, where known, nature of complaint.

Specifically,

A. The formal complaint record does not include the initial communication between your firm and complainant. This information was frequently observed to contain more descriptive information regarding adverse events when compared to your firm's Quality approved complaint record.

B. Your firm's Quality approved complaint records contain vague, canned language to describe adverse events. This includes the wording "patient did not achieve the expected response" (or a subtle variation).

*** DATES OF INSPECTION:**
10/10/2012(Wed), 10/11/2012(Thu), 10/12/2012(Fri), 10/15/2012(Mon), 10/16/2012(Tue), 10/18/2012(Thu), 10/19/2012(Fri), 10/22/2012(Mon), 10/23/2012(Tue), 10/26/2012(Fri), 11/06/2012(Tue), 11/07/2012(Wed), 11/08/2012(Thu), 11/09/2012(Fri)

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